

Rebecca Terry vs County of Milwaukee, et al.

17-CV-1112

Transcript of the Testimony of:

**DASHYLA ELLIOTT**

April 24, 2018



1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF WISCONSIN

3 -----  
4 REBECCA TERRY,

5 Plaintiff,

6 -vs-

Case No. 17-CV-1112

7 COUNTY OF MILWAUKEE, et al.

8 Defendants.  
9 -----

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11  
12 Deposition of DASHYLA ELLIOTT

13 Thursday, April 24th, 2018

14 10:03 a.m.

15 at

16 LEIB, KNOTT & GAYNOR, LLC  
17 219 North Milwaukee Street, Suite 710  
18 Milwaukee, Wisconsin  
19

20 Reported by: Wendy L. Hanneman, RPR  
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22  
23  
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<p>Page 2</p> <p>1 Deposition of DASHYLA ELLIOTT, a witness in 2 the above-entitled action, taken at the instance of the 3 Defendants, pursuant to the Federal Rules of Civil 4 Procedure, pursuant to notice, before WENDY L. HANNEMAN, 5 Registered Professional Reporter and Notary Public in 6 and for the State of Wisconsin, at LEIB, KNOTT &amp; GAYNOR, 7 LLC, 219 North Milwaukee Street, Suite 710, Milwaukee, 8 Wisconsin, on the 24th day of April, 2018, commencing at 9 10:03 a.m. and concluding at 11:42 a.m.</p> <p>10</p> <p>11 A P P E A R A N C E S:</p> <p>12 LOEVY &amp; LOEVY, by 13 Ms. Aisha N. Davis 14 311 North Aberdeen Street, 3rd Floor 15 Chicago, Illinois 60607 16 Appeared on behalf of the Plaintiff.</p> <p>17</p> <p>18 LEIB, KNOTT &amp; GAYNOR, LLC, by 19 Mr. Randal N. Arnold 20 219 North Milwaukee Street, Suite 710 21 Milwaukee, Wisconsin 53202 22 Appeared on behalf of Defendants, County of 23 Milwaukee, David A. Clarke, Jr., Officer 24 Brian Wenzel, Carolyn Exum, Morgan Bevenue, 25 and Margaret Hoover.</p> <p>26</p> <p>27 HINSHAW &amp; CULBERTSON, by 28 Ms. Mollie T. Kugler 29 100 East Wisconsin Avenue, Suite 2600 30 Milwaukee, Wisconsin 53202 31 Appeared on behalf of Defendant, Armor 32 Correctional Health Services.</p>	<p>Page 4</p> <p>1 TRANSCRIPT OF PROCEEDINGS 2 DASHYLA ELLIOTT, called as a witness 3 herein, having been first duly sworn on oath, was 4 examined and testified as follows: 5 E X A M I N A T I O N 6 BY MS. DAVIS: 7 Q Good morning. 8 A Good morning. 9 Q Could you please state and spell your name for the 10 record? 11 A Dashyla Elliott. D-A-S-H-Y-L-A. Elliott, 12 E-L-L-I-O-T-T. 13 Q Have you ever been deposed before? 14 A No. 15 Q Okay. So I'm just going to let you know a couple 16 of the rules. The first is that we have to not 17 talk over each other. 18 A Mm-hmm. 19 Q So I'm going to ask a question, you're going to 20 answer. I'm not going to interrupt you, you're not 21 going to interrupt me. If you ever need a break 22 for any reason, just let me know. And the only 23 reason that we might pause on a break is if there's 24 a question that's been asked, so you just give us 25 the answer, and we'll take a break.</p>
<p>Page 3</p> <p>1 I N D E X 2 EXAMINATION 3 MS. DAVIS 4, 78 4 MR. ARNOLD 74 5 MS. KUGLER 76 6 7 E X H I B I T S 8 NO. DESCRIPTION PAGE IDENTIFIED 9 Exh. 1 Logs, records and reports policy 16 10 11 Exh. 2 Updated logs, records and reports policy 18 12 Exh. 3 Detention Bureau Infirmary IM 8 20 13 Exh. 4 Updated Detention Bureau Infirmary IM 8 24 14 15 Exh. 5 Supervise "Special" Needs Inmates/Crisis Intervention 28 16 Exh. 6 Jail health care training guide 33 17 Exh. 7 Health care PowerPoint 35 18 Exh. 8 Monthly shift assignments 39 19 Exh. 9 Jail log 43 20 Exh. 10 Jail log 48 21 Exh. 11 Incident report 54 22 23 (Exhibits were retained by the court reporter. 24 Originals attached to original transcript and 25 copies to copy transcripts.)</p>	<p>Page 5</p> <p>1 If you don't understand a question, let me 2 know, I'll rephrase it. And if you answer, I'm 3 going to assume that you understood what I was 4 asking. 5 A Okay. 6 Q And then answers need to be verbal as opposed to 7 nodding or shaking your head. I do that as well, 8 so. Just got to be very audible with our answers. 9 And, then, have you ever been a defendant in a 10 lawsuit before? 11 A Correct. 12 Q Okay. 13 A Health care, you know, bills. 14 Q Mm-hmm. Okay. And have you ever testified in 15 court before? 16 A No. 17 Q Okay. Leading up to the deposition -- well, before 18 we started, I was handed a couple documents that I 19 was told you reviewed leading up to the deposition. 20 A Yes. 21 Q Are those the only two documents? 22 A Yes. 23 Q And that would be a jail log marked Milwaukee 24 County 175, and the incident report, Milwaukee 25 County Pages 11 through 14?</p>

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<p>1 A That's correct.</p> <p>2 Q Okay. Where are you currently employed?</p> <p>3 A Outagamie County Sheriff.</p> <p>4 Q Outagamie County. What state is that?</p> <p>5 A It's in Wisconsin.</p> <p>6 Q I'm only asking because it's Allegheny County out</p> <p>7 in Virginia.</p> <p>8 A Oh, okay.</p> <p>9 MS. KUGLER: It's Outagamie County.</p> <p>10 BY MS. DAVIS:</p> <p>11 Q Oh, could you spell that for me?</p> <p>12 A O-U-T-A-G-A-M-I-E.</p> <p>13 Q What are you currently doing with Outagamie</p> <p>14 County?</p> <p>15 A Telecommunicator, dispatch.</p> <p>16 Q Is that with a particular department, or is it a --</p> <p>17 A With the sheriff's office, I'm sorry, yes. Mm-hmm.</p> <p>18 Q And prior to working with Outagamie County, what</p> <p>19 was your position?</p> <p>20 A I was a correctional officer.</p> <p>21 Q When did you stop doing that?</p> <p>22 A In January of this year.</p> <p>23 Q When did you start?</p> <p>24 A February of '12. 2012.</p> <p>25 Q Okay. And was that all with the Milwaukee County</p>	<p>1 you work?</p> <p>2 A Loft. It was called Ann Taylor Loft at the time.</p> <p>3 Q Mm-hmm. And how long did you work there?</p> <p>4 A October of 2006 until December 2010.</p> <p>5 Q Okay. Where did you work before that, if you</p> <p>6 remember?</p> <p>7 A Dillard's. It was a department store.</p> <p>8 Q Mm-hmm. Any other jobs prior to that?</p> <p>9 A Best Buy. This is all part-time jobs in college.</p> <p>10 Q Okay. Was Dillard's part time as well?</p> <p>11 A Yes. The only full-time job I had was Milwaukee</p> <p>12 County Jail.</p> <p>13 Q Okay. Got it. And when did you graduate from</p> <p>14 college?</p> <p>15 A In 2005.</p> <p>16 Q What college did you go to?</p> <p>17 A UW-Milwaukee.</p> <p>18 Q So prior to working with the Milwaukee County Jail,</p> <p>19 did you have any prior correctional officer</p> <p>20 experience?</p> <p>21 A No.</p> <p>22 Q Any other law enforcement experience?</p> <p>23 A No.</p> <p>24 Q When you were hired as a corrections officer with</p> <p>25 Milwaukee County, did you undergo any training?</p>
Page 7	Page 9
<p>1 Sheriff's Office?</p> <p>2 A Yes. But it was -- I started out at the Milwaukee</p> <p>3 House of Corrections. It was all under the</p> <p>4 Milwaukee County Sheriff's Office at the time,</p> <p>5 though.</p> <p>6 Q Okay. So you started in February of 2012 at the</p> <p>7 Milwaukee County House of Corrections?</p> <p>8 A Yes.</p> <p>9 Q How long were you there?</p> <p>10 A Until November of 2012.</p> <p>11 Q And then where did you go?</p> <p>12 A To Milwaukee County Jail.</p> <p>13 Q And were you there throughout -- until January</p> <p>14 2018?</p> <p>15 A Yes.</p> <p>16 Q Okay. When you left the Milwaukee County Jail,</p> <p>17 were you a corrections officer, or were you</p> <p>18 promoted at any point?</p> <p>19 A I was a corrections officer.</p> <p>20 Q Prior to working with the Milwaukee County Jail,</p> <p>21 where did you work?</p> <p>22 A I worked for Aldi, Inc.</p> <p>23 Q How long did you work there?</p> <p>24 A February 2010 until February 2012.</p> <p>25 Q Okay. And prior to working with Aldi, where did</p>	<p>1 A Yes.</p> <p>2 Q Okay. Was that the academy?</p> <p>3 A Yes.</p> <p>4 Q Okay. How long was that training program?</p> <p>5 A Six-week training.</p> <p>6 Q Was there any other training after that?</p> <p>7 A Annual training.</p> <p>8 Q What was the annual training?</p> <p>9 A I don't know. It varied every year. I was there</p> <p>10 for six years, so I don't know what training was</p> <p>11 about every time.</p> <p>12 Q Okay.</p> <p>13 A I don't remember, I'm sorry.</p> <p>14 Q No, that's fair. Were there any annual trainings</p> <p>15 that were repeated?</p> <p>16 A Yes.</p> <p>17 Q Okay. Do you remember which ones those were?</p> <p>18 A CPR. Um, dealing with, um, mental health inmates.</p> <p>19 Q Okay.</p> <p>20 A Always POSC, which is basically subject control.</p> <p>21 MR. ARNOLD: I'm sorry, what's the word</p> <p>22 you're using?</p> <p>23 THE WITNESS: POSC is an acronym.</p> <p>24 P-O-S-C.</p> <p>25</p>



<p style="text-align: right;">Page 10</p> <p>1 BY MS. DAVIS:</p> <p>2 Q And outside of those repeated trainings, there were</p> <p>3 just others that happened during that annual time</p> <p>4 of training?</p> <p>5 A Yeah.</p> <p>6 MS. KUGLER: Objection. Form.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q When you were at the academy, were there any tests</p> <p>9 given after courses?</p> <p>10 A After the academy?</p> <p>11 Q Yeah.</p> <p>12 A There were no testing really after academy.</p> <p>13 Q All right. Were there any tests after the annual</p> <p>14 training sessions?</p> <p>15 A Yes.</p> <p>16 Q What was the format of those?</p> <p>17 MS. KUGLER: Objection. Form.</p> <p>18 THE WITNESS: CPR training. We had to</p> <p>19 perform CPR on the dummy. Principles of subject</p> <p>20 control, we had to be able to perform the positions</p> <p>21 and moves they trained us.</p> <p>22 BY MS. DAVIS:</p> <p>23 Q Okay. Were there any written exams?</p> <p>24 A There's probably like worksheets. But not any</p> <p>25 serious tests where, you know, it was serious like</p>	<p style="text-align: right;">Page 12</p> <p>1 Q Okay. And during those trainings, do you remember</p> <p>2 what subjects were covered?</p> <p>3 A Um, vaguely.</p> <p>4 Q Can you tell me a little about them? Anything you</p> <p>5 remember.</p> <p>6 A Recognizing when somebody might be going through a</p> <p>7 crisis-type situation. Um, suicide watch training.</p> <p>8 Um, just basically things to look out for.</p> <p>9 Q Okay. So while you were a corrections officer,</p> <p>10 where were you stationed, or what were all of the</p> <p>11 places that you were stationed in the jail?</p> <p>12 MR. ARNOLD: When she was at the jail?</p> <p>13 MS. DAVIS: Mm-hmm.</p> <p>14 MR. ARNOLD: Rather than House of</p> <p>15 Corrections?</p> <p>16 MS. DAVIS: Yes. Sorry.</p> <p>17 Q So the questions I'm going to ask about working at</p> <p>18 a jail, I'm specifically talking about the</p> <p>19 Milwaukee County Jail, not the House of</p> <p>20 Corrections, okay?</p> <p>21 A Okay.</p> <p>22 Q So where in the jail were you stationed?</p> <p>23 A Everywhere.</p> <p>24 Q Okay. Were there any places you were stationed</p> <p>25 more often than others?</p>
<p style="text-align: right;">Page 11</p> <p>1 this is a test.</p> <p>2 Q Okay.</p> <p>3 A A pass/fail test type of thing, you know.</p> <p>4 Q Okay.</p> <p>5 A There were worksheets, though.</p> <p>6 Q Okay. Were there any of the -- sorry, strike that.</p> <p>7 During any of those annual trainings, were</p> <p>8 there any mental health trainings, outside of the</p> <p>9 one that you mentioned earlier with inmates?</p> <p>10 A I guess I don't understand the question.</p> <p>11 Q Okay. You mentioned earlier that there was some</p> <p>12 mental health trainings annually?</p> <p>13 A Mm-hmm.</p> <p>14 Q Do you --</p> <p>15 A It was repeated. Not annually.</p> <p>16 Q It was repeated?</p> <p>17 A Mm-hmm.</p> <p>18 Q How often?</p> <p>19 A Um, I remember it being at least twice that we had</p> <p>20 an annual training.</p> <p>21 Q And you don't remember -- well, do you remember</p> <p>22 exactly what years those were?</p> <p>23 A Um, we just had one recently. I went in -- I quit</p> <p>24 in January, so I want to say the most recent was</p> <p>25 maybe in October of 2017.</p>	<p style="text-align: right;">Page 13</p> <p>1 A Towards the end, yes. My last few years I was</p> <p>2 mainly on the G level, which consists of our</p> <p>3 booking department and our jail records area.</p> <p>4 Q Were there any specialized trainings that you</p> <p>5 needed to go through to work in any of the pods or</p> <p>6 housing units?</p> <p>7 A Yes, the regular academy training.</p> <p>8 Q Okay. Any other training that was specific to the</p> <p>9 different housing units in the jail?</p> <p>10 MS. KUGLER: Objection to form.</p> <p>11 THE WITNESS: Not that I -- no, not that</p> <p>12 I can remember.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Okay. Were you ever stationed in the Special</p> <p>15 Medical Unit in the jail?</p> <p>16 A Yes.</p> <p>17 Q Do you know about how often you were stationed</p> <p>18 there?</p> <p>19 A I -- a lot in the course of my six years. A lot.</p> <p>20 Um, it was a time when they tried to do rotations,</p> <p>21 um, where that was my specific rotation for about</p> <p>22 60 days. Also, um, I worked a lot of overtime</p> <p>23 there on first or second shift.</p> <p>24 Q When you say you had that rotation for 60 days,</p> <p>25 does that mean you were there for all 60 of those</p>

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<p>1 days?</p> <p>2 A If I worked that specific day, that was where I was</p> <p>3 working.</p> <p>4 Q Okay.</p> <p>5 A And I was third shift, so that's where I was at.</p> <p>6 Q Okay. While you were working at the Milwaukee</p> <p>7 County Jail, did you ever hear the SMU referred to</p> <p>8 as the "infirmary"?</p> <p>9 A Yes.</p> <p>10 Q Was it common to switch between the two terms?</p> <p>11 A It depends on who it was.</p> <p>12 Q Who would refer to it more as an infirmary?</p> <p>13 A Officers that --</p> <p>14 MS. KUGLER: Objection. Form.</p> <p>15 THE WITNESS: Officers that had been</p> <p>16 there for some time.</p> <p>17 BY MS. DAVIS:</p> <p>18 Q Do you remember when it was renamed to the SMU?</p> <p>19 A It was always called SMU throughout my tenure</p> <p>20 there, so.</p> <p>21 Q Okay.</p> <p>22 A I always called it SMU.</p> <p>23 Q Are there any other names that the SMU is referred</p> <p>24 to besides "SMU" and "infirmary"?</p> <p>25 A Not that I can think of.</p>	<p>1 October?</p> <p>2 A Maybe an hour or two. I don't remember.</p> <p>3 Q Okay. When you were going through the six-week</p> <p>4 academy, did you receive any paperwork for the</p> <p>5 trainings that you attended?</p> <p>6 A Yes.</p> <p>7 Q Okay. Now we'll talk about a few different</p> <p>8 policies. I'm just going to walk through it.</p> <p>9 Let's start with this one.</p> <p>10 (Exh. 1 marked for identification.)</p> <p>11 BY MS. DAVIS:</p> <p>12 Q Okay, I'm going to hand you what's been marked as</p> <p>13 Exhibit 1. This is the logs, records and reports</p> <p>14 policy. Do you recognize this policy?</p> <p>15 A Yes.</p> <p>16 Q Did you receive a copy of this?</p> <p>17 A Yes.</p> <p>18 Q Was it during the academy that you received a copy</p> <p>19 of this?</p> <p>20 A Yes.</p> <p>21 Q Were you -- was there specific training on this</p> <p>22 policy?</p> <p>23 A Yes.</p> <p>24 MS. KUGLER: Objection. Form.</p> <p>25</p>
Page 15	Page 17
<p>1 Q Okay. While you were working at the Milwaukee</p> <p>2 County Jail, were you there when Armor Correctional</p> <p>3 Health began working with the Jail?</p> <p>4 A Yes.</p> <p>5 Q Okay. Did you ever receive any special training</p> <p>6 from Armor Correctional?</p> <p>7 MS. KUGLER: Objection, form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q What training did you receive from Armor?</p> <p>11 A They were the ones that gave us the latest -- the</p> <p>12 most recent mental health training.</p> <p>13 Q Is that the one that you said happened in</p> <p>14 October --</p> <p>15 A October, yes. Mm-hmm.</p> <p>16 Q -- of 2017?</p> <p>17 MR. ARNOLD: Try not to talk at the same</p> <p>18 time. It's easy to do, but.</p> <p>19 BY MS. DAVIS:</p> <p>20 Q Do you remember who led that training?</p> <p>21 A I can't remember her name, but it was a black lady.</p> <p>22 Q Were there any other trainings that were hosted by</p> <p>23 Armor?</p> <p>24 A Not that I can remember.</p> <p>25 Q How long was that mental health training in</p>	<p>1 BY MS. DAVIS:</p> <p>2 Q To the best of your recollection, were you trained</p> <p>3 on maintaining jail logs?</p> <p>4 A Yes.</p> <p>5 Q Okay. Did this training include any security</p> <p>6 training?</p> <p>7 A Yes.</p> <p>8 Q Okay. Do you remember what was covered in the</p> <p>9 security training?</p> <p>10 A Yes.</p> <p>11 Q Can you tell me a little bit about it?</p> <p>12 A Basically that, um, it was confidential, that it</p> <p>13 had to be accurate, it could be used to -- it could</p> <p>14 be used in court, and it's a legal document.</p> <p>15 Q Okay. When you were a corrections officer, did</p> <p>16 anyone review your logs and records?</p> <p>17 A Yes.</p> <p>18 Q Who would review those?</p> <p>19 A The captains and the lieutenants. The command</p> <p>20 staff.</p> <p>21 Q Okay. And is this document -- I'm sorry, let me go</p> <p>22 back. Are you sure that this is the exact document</p> <p>23 that you received when you were in the academy?</p> <p>24 A I don't know if it's the exact one, no.</p> <p>25 Q Okay.</p>

<p style="text-align: right;">Page 18</p> <p>1 A But it is a policy that I know we had.</p> <p>2 Q Okay. Did you ever receive any updated versions of</p> <p>3 this policy?</p> <p>4 A Yes.</p> <p>5 Q Okay.</p> <p>6 (Exh. 2 marked for identification.)</p> <p>7 BY MS. DAVIS:</p> <p>8 Q I'm handing you what's been marked as Exhibit 2.</p> <p>9 Is that the updated version of the policy, to the</p> <p>10 best of your knowledge?</p> <p>11 MR. ARNOLD: If you know.</p> <p>12 THE WITNESS: I don't know.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Okay. That's fine. If you look at the top, it</p> <p>15 notes the second revision is October 2014. Do you</p> <p>16 see that?</p> <p>17 A Yes.</p> <p>18 Q Do you remember around October of 2014 receiving</p> <p>19 any updated policy around logs, records and</p> <p>20 reports?</p> <p>21 A I remember getting an updated version, but I don't</p> <p>22 know when it was.</p> <p>23 Q Okay. Was there any training when you received</p> <p>24 that updated version?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 20</p> <p>1 that was basically a reminder, um, examples were</p> <p>2 given of how people entered it correctly, examples</p> <p>3 were given of what not to do.</p> <p>4 Q Okay. Do you recall any training on the Special</p> <p>5 Medical Unit in particular while you were in the</p> <p>6 academy?</p> <p>7 MS. KUGLER: Objection. Form.</p> <p>8 THE WITNESS: Special training?</p> <p>9 BY MS. DAVIS:</p> <p>10 Q Or let me rephrase it. Do you remember receiving</p> <p>11 any policies about the Special Medical Unit?</p> <p>12 A No.</p> <p>13 Q Okay.</p> <p>14 A I don't remember.</p> <p>15 Q Let's mark this one.</p> <p>16 (Exh. 3 marked for identification.)</p> <p>17 BY MS. DAVIS:</p> <p>18 Q Okay, I'm handing you what's been marked as</p> <p>19 Exhibit 3. If you could take a second and look</p> <p>20 that over, if you would like.</p> <p>21 A Okay.</p> <p>22 Q Okay. So the title of this document is "Detention</p> <p>23 Bureau Infirmary IM 8." Do you see that?</p> <p>24 A Yes.</p> <p>25 Q Okay. And the revision date is January 1st, 2008.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q Okay.</p> <p>2 A They talked about jail logs a lot, so I don't know</p> <p>3 if it was then, or after, before.</p> <p>4 Q When you say they talked about jail logs a lot, who</p> <p>5 do you mean?</p> <p>6 A The command staff.</p> <p>7 Q What would they talk about?</p> <p>8 A Making sure we enter everything as accurately as</p> <p>9 possible, and that all things that were required</p> <p>10 were entered.</p> <p>11 Q Okay. Were there ever any concerns about logs not</p> <p>12 being updated properly?</p> <p>13 A Well, not being updated, we can't update a log, we</p> <p>14 just have to enter it.</p> <p>15 Q Were there ever any times where command staff would</p> <p>16 train you or have another follow-up training</p> <p>17 because the jail logs were entered incorrectly?</p> <p>18 A Yes.</p> <p>19 Q Did that happen more than once, to your knowledge?</p> <p>20 A Yes.</p> <p>21 Q Did it happen often?</p> <p>22 A Yes.</p> <p>23 Q Okay. Could you estimate about how often that</p> <p>24 happened?</p> <p>25 A It was almost a daily -- a daily roll call issue</p>	<p style="text-align: right;">Page 21</p> <p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Okay. Does this document look familiar to you?</p> <p>4 A I've seen it before.</p> <p>5 Q Okay. And on the document that you've seen, it</p> <p>6 said "infirmary", not Special Medical Unit?</p> <p>7 A That's correct.</p> <p>8 Q Okay. To the best of your recollection, were you</p> <p>9 trained on maintaining the workstation at the</p> <p>10 infirmary?</p> <p>11 A Yes.</p> <p>12 Q Were you trained on maintaining the jail log at the</p> <p>13 infirmary?</p> <p>14 A Yes.</p> <p>15 Q Were you trained on the use of telephones in the</p> <p>16 infirmary?</p> <p>17 A Yes.</p> <p>18 Q Radios?</p> <p>19 A Yes.</p> <p>20 Q And television use?</p> <p>21 A Yes.</p> <p>22 Q If we turn to Milwaukee County 108, at IM 8.1.6,</p> <p>23 where it says "Pod Access", is the "pod" referring</p> <p>24 to the entire infirmary, or the cells within the</p> <p>25 infirmary?</p>

Page 22	Page 24
<p>1 A The pod access?</p> <p>2 Q Yeah.</p> <p>3 MR. ARNOLD: If you know.</p> <p>4 THE WITNESS: The pod is the SMU.</p> <p>5 MS. DAVIS: Okay.</p> <p>6 Q And then going down to IM 8.1.7 on the same page,</p> <p>7 the first bullet point under the infirmary,</p> <p>8 "Officer shall: Conduct 30-minute inspections of</p> <p>9 inmate cells and general living areas and document</p> <p>10 the inspection in the pod logbook," correct?</p> <p>11 A Yes.</p> <p>12 Q Did you have to conduct these 30-minute inspections</p> <p>13 when you were stationed in the SMU?</p> <p>14 A Yes.</p> <p>15 Q Were there ever any instructions during the roll</p> <p>16 call about conducting these inspections?</p> <p>17 A Conducting the inspections in general, yes.</p> <p>18 Q Okay. When you say "in general", do you mean in</p> <p>19 all the housing units?</p> <p>20 A Yes.</p> <p>21 Q Okay. Were there ever -- well, earlier you said</p> <p>22 that there were reminders of how to enter jail logs</p> <p>23 at roll call?</p> <p>24 A Yes.</p> <p>25 Q Were there reminders about entering the information</p>	<p>1 BY MS. DAVIS:</p> <p>2 Q Okay. I'm handing you what's been marked as</p> <p>3 Exhibit Number 4. You can take a second to look</p> <p>4 that over.</p> <p>5 A Okay.</p> <p>6 Q Okay. Do you recognize this document?</p> <p>7 A Mm-hmm.</p> <p>8 Q Do you remember receiving a copy of it?</p> <p>9 A I don't --</p> <p>10 Q Okay.</p> <p>11 A -- remember.</p> <p>12 Q Do you remember having any trainings on an updated</p> <p>13 policy for the Special Medical Unit?</p> <p>14 A I don't remember.</p> <p>15 Q And then at the top of the first page, it says,</p> <p>16 "Second revision, 10/20/14," correct?</p> <p>17 A Mm-hmm.</p> <p>18 Q And that was during your time at the Milwaukee</p> <p>19 County Jail, correct?</p> <p>20 A That's true.</p> <p>21 Q Okay. You mentioned that you were stationed in the</p> <p>22 Special Medical Unit occasionally, right?</p> <p>23 A Yes.</p> <p>24 Q While you were stationed there, did you have any</p> <p>25 training on how to communicate with the medical</p>
Page 23	Page 25
<p>1 for 30-minute inspections at roll call?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: Just make sure we were</p> <p>4 doing within 30 minutes.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Okay. And when you were trained on conducting the</p> <p>7 30-minute inspections, were you told how to either</p> <p>8 start or stop a timer that would monitor when you</p> <p>9 did the inspection?</p> <p>10 A I was initially trained at the House of</p> <p>11 Corrections, and we did not start or -- start</p> <p>12 inspections, but we always marked them complete.</p> <p>13 Q Okay. And was there any subsequent training at the</p> <p>14 jail, as opposed to at House of Corrections, about</p> <p>15 entering the inspection time?</p> <p>16 A When I came down, some officers were doing it like</p> <p>17 that, but some were not.</p> <p>18 Q Okay.</p> <p>19 A I was told that you do everything that was issued a</p> <p>20 button in the jail log, and there was no start</p> <p>21 button for inspections in the jail log.</p> <p>22 Q Okay. Do you remember receiving any updated</p> <p>23 policies about the infirmary or the SMU?</p> <p>24 A I don't remember.</p> <p>25 (Exh. 4 marked for identification.)</p>	<p>1 staff at the jail?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: That was covered in our</p> <p>4 regular training.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q In the regular training, okay. Do you remember the</p> <p>7 training about communicating with the medical</p> <p>8 staff?</p> <p>9 A Yes.</p> <p>10 Q Do you remember what subjects were covered?</p> <p>11 A Yes.</p> <p>12 Q Okay. Could you tell me a little bit about that</p> <p>13 training?</p> <p>14 A As far as communication with the nurses, you call</p> <p>15 them when an inmate was in distress, call them,</p> <p>16 talk to -- I don't know, you just talk to them if</p> <p>17 you need to.</p> <p>18 Q Okay. And how would you know if an inmate was in</p> <p>19 distress in the Special Medical Unit?</p> <p>20 A They would either yell out and tell you, they'd be</p> <p>21 in the day room and tell you, or they'll use their</p> <p>22 call button.</p> <p>23 Q And during those 30-minute inspections, or the</p> <p>24 inspections that were every 30 minutes, did you</p> <p>25 have to check and see if any of the inmates were in</p>

<p style="text-align: right;">Page 26</p> <p>1 distress?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: It was a visual inspection.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q What is a visual inspection?</p> <p>6 A Looking at the individual to see if they're in</p> <p>7 obvious distress.</p> <p>8 Q Did you ever work in the Special Needs Unit?</p> <p>9 A Rarely, but I have worked in there before.</p> <p>10 Q Okay. Did you receive any training on working in</p> <p>11 the Special Needs Unit?</p> <p>12 A Rarely -- no, because I hardly ever worked in</p> <p>13 there.</p> <p>14 Q Did you --</p> <p>15 A I could tell you that if I worked in there, it was</p> <p>16 always with a partner that was trained in that</p> <p>17 area, and that the times that I have worked in</p> <p>18 there, it was on a special watch.</p> <p>19 Q So you said you worked with people that were</p> <p>20 trained to work in there?</p> <p>21 A (Witness nods head.)</p> <p>22 Q Do you know what that training entailed?</p> <p>23 A Not all of it, no.</p> <p>24 Q Do you know some of it?</p> <p>25 A No, I don't know specifically. I was given a</p>	<p style="text-align: right;">Page 28</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Handing you what's been marked as Exhibit Number 5.</p> <p>3 We don't need to look through the whole thing, I'm</p> <p>4 just going to ask you a few questions.</p> <p>5 A Okay.</p> <p>6 Q I'm giving you the whole document, just because we</p> <p>7 have the whole document. Do you recognize this</p> <p>8 jail training?</p> <p>9 A Yes.</p> <p>10 Q Okay. Did you receive a copy of it ever?</p> <p>11 A Yes.</p> <p>12 Q When did you receive a copy of it?</p> <p>13 A When I began in training with the academy.</p> <p>14 Q Okay. So every CO went through a training on this</p> <p>15 "Supervise "Special" Needs Inmates/Crisis</p> <p>16 Intervention"?</p> <p>17 A In training.</p> <p>18 Q To the best of your recollection, during the</p> <p>19 training guide -- or during the training for this</p> <p>20 guide, were you trained on how to determine if an</p> <p>21 inmate was undergoing what was considered normal</p> <p>22 emotional distress?</p> <p>23 MS. KUGLER: Objection. Form.</p> <p>24 THE WITNESS: Yes.</p> <p>25</p>
<p style="text-align: right;">Page 27</p> <p>1 general training.</p> <p>2 Q Mm-hmm.</p> <p>3 A But not the more specific word that they called it,</p> <p>4 CIT training.</p> <p>5 Q Do you know what that stands for?</p> <p>6 A No, because I'm not trained in it.</p> <p>7 Q Okay, that's okay. Who decided who was given the</p> <p>8 CIT training?</p> <p>9 A Um, it was usually a roll call issue where they</p> <p>10 asked if you wanted specialized training in this</p> <p>11 area, to sign up for it.</p> <p>12 Q Was there any other specialized training announced</p> <p>13 during roll call?</p> <p>14 A As far as what? It was always announced that if</p> <p>15 you wanted additional training in different areas.</p> <p>16 Q Okay. Do you remember any of the areas that they</p> <p>17 offered specialized or additional training on?</p> <p>18 A Yeah, if you wanted to be an AFIS officer, a</p> <p>19 weapons officer. If you wanted to be trained in</p> <p>20 release. Different areas. All areas of the jail.</p> <p>21 If you wanted to be a CERT member, Corrections</p> <p>22 Emergency Response Team. Yeah.</p> <p>23 Q Okay. All right.</p> <p>24 (Exh. 5 marked for identification.)</p> <p>25</p>	<p style="text-align: right;">Page 29</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay. Were you trained on how to determine if an</p> <p>3 inmate was undergoing possibly serious emotional</p> <p>4 distress?</p> <p>5 A Yes. General training.</p> <p>6 Q Were you trained on how to supervise inmates who</p> <p>7 may be suicide risks?</p> <p>8 A Yes.</p> <p>9 Q Were you trained on how to supervise inmates with</p> <p>10 intellectual disabilities?</p> <p>11 A Yes.</p> <p>12 Q Were you trained on how to intervene in a crisis?</p> <p>13 A Yes.</p> <p>14 Q Was this training specific for inmates who were</p> <p>15 housed in the Special Needs Unit?</p> <p>16 A Um, well, sometimes you don't -- you see it in the</p> <p>17 booking room, you don't always see it in -- when</p> <p>18 they make it this far.</p> <p>19 Q So is it fair to say that you would apply this</p> <p>20 training to any area of the jail that you were</p> <p>21 working in?</p> <p>22 A Yes.</p> <p>23 Q And was there additional training offered during</p> <p>24 roll call for working in the Special Needs Unit?</p> <p>25 A There was sometimes roll call reminders about that,</p>

Page 30	Page 32
<p>1        yeah.</p> <p>2        Q     Okay. Was there any certification that you</p> <p>3                received after this training?</p> <p>4                MR. ARNOLD: Object to the form of the</p> <p>5                question. Which training are you referring to?</p> <p>6        BY MS. DAVIS:</p> <p>7        Q     Was there any certification that you received after</p> <p>8                the Supervise "Special" Needs Inmates/Crisis</p> <p>9                Intervention training?</p> <p>10                MS. KUGLER: Thank you.</p> <p>11                THE WITNESS: You mean additional</p> <p>12                training?</p> <p>13        BY MS. DAVIS:</p> <p>14        Q     Any certification?</p> <p>15        A     Me specifically, no.</p> <p>16        Q     Okay. Do you know how long the training was for</p> <p>17                the Supervise "Special" Needs Inmates/Crisis</p> <p>18                Intervention training?</p> <p>19        A     No.</p> <p>20        Q     Okay.</p> <p>21        A     Because I'm not trained in it.</p> <p>22        Q     So when they gave you this guide during the</p> <p>23                academy, did they do any training related to it?</p> <p>24        A     We got very general training. And this -- I'm not</p> <p>25                even sure if this is the right document, if this is</p>	<p>1        suicide. Um, I do remember talking about getting</p> <p>2                inmates PSWs, which is psych social workers, if</p> <p>3                they asked for them.</p> <p>4        Q     Mm-hmm.</p> <p>5        A     Some of this stuff was covered, yes.</p> <p>6        Q     Okay. Can you tell me which areas were covered,</p> <p>7                outside of the suicide risk, suicide, and PSW?</p> <p>8                MS. KUGLER: Objection. Form,</p> <p>9                foundation.</p> <p>10                MR. ARNOLD: If you remember.</p> <p>11                MS. DAVIS: If you remember.</p> <p>12                THE WITNESS: That's all I remember.</p> <p>13        BY MS. DAVIS:</p> <p>14        Q     Okay. Do you remember going through any training</p> <p>15                on jail health care while you were in the academy?</p> <p>16        A     Yes.</p> <p>17        Q     Do you remember during that training there was a</p> <p>18                PowerPoint that was used to go over the</p> <p>19                information?</p> <p>20        A     I don't remember, but it was almost a PowerPoint</p> <p>21                for everything in training, so.</p> <p>22        Q     Okay.</p> <p>23                (Exh. 6 marked for identification.)</p> <p>24        BY MS. DAVIS:</p> <p>25        Q     I'm handing you what's marked as Exhibit 6.</p>
Page 31	Page 33
<p>1        a CIT training document, or if this is basically</p> <p>2                how to spot inmates that may be going through a</p> <p>3                crisis.</p> <p>4        Q     Okay.</p> <p>5        A     So I don't know by looking at this. This might be</p> <p>6                the specialized training document, I'm not sure.</p> <p>7        Q     Okay.</p> <p>8        A     For the CIT.</p> <p>9        Q     So when you did receive training on recognizing</p> <p>10                emotional distress at the academy, about how long</p> <p>11                was that training?</p> <p>12        A     It was six years ago, I don't remember.</p> <p>13        Q     Okay. Earlier you mentioned that you had that</p> <p>14                mental health training hosted by Armor in</p> <p>15                October 2017, right?</p> <p>16        A     What was the question?</p> <p>17        Q     You mentioned earlier that there was a mental</p> <p>18                health training in October 2017?</p> <p>19        A     Yes.</p> <p>20        Q     Did that cover any of the topics that are covered</p> <p>21                in this training guide?</p> <p>22        A     I didn't look through all of it, but.</p> <p>23        Q     Take your time and you can flip through the table</p> <p>24                of contents if you want.</p> <p>25        A     I do remember talking about suicide risk and</p>	<p>1        A     Mm-hmm.</p> <p>2        Q     Again, we're not going to go through all of this</p> <p>3                document, I just wanted to give you the whole thing</p> <p>4                in case you wanted to look through it. Do you</p> <p>5                recognize this document?</p> <p>6        A     Um, yes.</p> <p>7        Q     Is it one of the documents that you received during</p> <p>8                the academy?</p> <p>9                MR. ARNOLD: If you know.</p> <p>10                THE WITNESS: It probably was. I don't</p> <p>11                remember every single document that was given to me</p> <p>12                in training.</p> <p>13        BY MS. DAVIS:</p> <p>14        Q     Okay. That's fair. So to the best of your</p> <p>15                recollection during the training on jail health</p> <p>16                care, do you remember being trained on assisting</p> <p>17                people housed in the Special Medical Unit?</p> <p>18        A     It was no specialized training for that.</p> <p>19        Q     Okay. Did the training include instructions on</p> <p>20                helping to provide health care to inmates?</p> <p>21        A     Yes.</p> <p>22        Q     Did it include training on administering</p> <p>23                medication?</p> <p>24        A     We don't give medication.</p> <p>25        Q     Okay. Who gives the medication in the jail?</p>



Page 34	Page 36
<p>1 A The nurse.</p> <p>2 Q And do you ever have to notify the nurse that an inmate needs medication?</p> <p>3 A They have med passes. We notify a nurse if an inmate says they didn't get their meds.</p> <p>4 Q Was there any training on following medical orders?</p> <p>5 A Yes.</p> <p>6 Q To the best of your recollection, were you trained on the duty to care for inmates?</p> <p>7 A Yes.</p> <p>8 MS. KUGLER: Objection. Form.</p> <p>9 BY MS. DAVIS:</p> <p>10 Q To the best of your recollection, were you trained on how to respond to requests for medical care?</p> <p>11 A Yes.</p> <p>12 Q Going back to the training on the duty to care for inmates, do you remember any part of that training in particular?</p> <p>13 A Basically that we have a duty to get inmates help if they ask. Um, and if we don't do that, we could be criminally charged and sued civilly.</p> <p>14 Q So they walked you through legal, like I guess legal consequences of the duty to --</p> <p>15 A Yes.</p> <p>16 Q Okay. I asked you about PowerPoints, so we're</p>	<p>1 Conduct screening for inmate health." Were you trained on conducting screenings for inmate health?</p> <p>2 A I don't know what that is.</p> <p>3 Q Okay. Going down to the slide on the bottom right side. Do you remember being trained on responding to inmate needs or request for medical care?</p> <p>4 A Yes.</p> <p>5 Q Okay.</p> <p>6 MR. ARNOLD: I'm sorry, where were you referring to?</p> <p>7 MS. DAVIS: Page 10, bottom right slide.</p> <p>8 MR. ARNOLD: Okay, thank you.</p> <p>9 MS. DAVIS: Mm-hmm.</p> <p>10 Q And then if we go to Page 11, the top right slide. Were you trained on controlling, administering, and/or delivering medication?</p> <p>11 A We don't administer medication, the nurse does that.</p> <p>12 Q Okay. Were you trained on providing health care, emergency and non-emergency?</p> <p>13 A I call the nurse. I don't provide health care, I'm not trained to do that.</p> <p>14 Q Okay. And, then, were you trained to maintain health care records?</p> <p>15 A I don't -- I don't maintain health care records.</p>
Page 35	Page 37
<p>1 going to go ahead and look through this one.</p> <p>2 (Exh. 7 marked for identification.)</p> <p>3 BY MS. DAVIS:</p> <p>4 Q I'm handing you what's been marked as Exhibit Number 7. Do you recognize this PowerPoint?</p> <p>5 A Not specifically.</p> <p>6 Q Okay. Let's just walk through a couple of things, then. Do you remember being trained on Wisconsin State Statute 302.38? That's on the first page.</p> <p>7 A I remember hearing about that.</p> <p>8 Q Do you remember hearing about Wisconsin Statute 302.365? It's on the second page.</p> <p>9 A I remember hearing about this.</p> <p>10 Q Okay. Then turning to the third page, do you remember hearing about Administrative Code 350?</p> <p>11 A Yes.</p> <p>12 Q On the top left slide on Page 3, is that the legal requirement that you remember being trained on?</p> <p>13 A Yes.</p> <p>14 Q If you turn to Page 9, do you remember being trained on the case law listed on this page?</p> <p>15 A Yep. Yes.</p> <p>16 Q And if you flip over to Page 10, on the top right slide it says, "Duties of the Jail Officer.</p>	<p>1 Q Okay. So is it fair to say that of those three topics we talked about on this slide, would those be areas where you would call the nurse as opposed to doing something yourself?</p> <p>2 A Yes.</p> <p>3 MS. KUGLER: Objection to form.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q Was this training -- scratch that. During this training, were you instructed on when you were to contact medical staff?</p> <p>6 A Yes.</p> <p>7 Q Okay. All right. The training for jail health care and working with special needs inmates were both done during the academy, correct?</p> <p>8 A A general training, yes.</p> <p>9 Q Okay. Who led the trainings in the academy?</p> <p>10 MR. ARNOLD: If you know.</p> <p>11 THE WITNESS: There was this nurse named Lisa. I don't remember her -- Krueger. Krueger, maybe. She did one of the trainings that I remember specifically. But that's the only one I remember.</p> <p>12 BY MS. DAVIS:</p> <p>13 Q Okay. Were any of the trainings conducted by staff from the Milwaukee County Sheriff's Office?</p>

<p style="text-align: right;">Page 38</p> <p>1 A I believe she did work for the Milwaukee County Sheriff's Office.</p> <p>2</p> <p>3 Q So were all the instructors employees of the Milwaukee County Sheriff's Office?</p> <p>4</p> <p>5 MR. ARNOLD: Objection. Foundation.</p> <p>6 MS. KUGLER: Objection.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q If you know, were the trainings provided by employees of the Milwaukee County Sheriff's Office?</p> <p>9</p> <p>10 A The only one I remember was Lisa, and she was employed by the Milwaukee County Sheriff's Office.</p> <p>11</p> <p>12 Q Okay. Did you have any trainings for employees of the Milwaukee County Sheriff's Office, where someone that did not work for the Milwaukee County Sheriff's Office was brought in to conduct the training?</p> <p>13</p> <p>14</p> <p>15 A Just the times when Armor gave presentations. That's the only one I remember.</p> <p>16</p> <p>17 Q Okay. Outside of Armor and the Milwaukee County Sheriff's Office, do you recall any other group that conducted a training that you attended while working for the Milwaukee County Jail?</p> <p>18</p> <p>19 MS. KUGLER: Objection. Form.</p> <p>20 THE WITNESS: Not that I can remember right away.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 40</p> <p>1 from the 9th into the 10th of March in 2014?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 MS. DAVIS: Actually, let me take it</p> <p>4 back.</p> <p>5 Q Why is your name in both of these columns?</p> <p>6 A Because I worked on both of those days.</p> <p>7 Q Okay. Did you work the third shift on both days?</p> <p>8 A It says I did.</p> <p>9 Q Okay. And you were in the fourth floor control on both days?</p> <p>10</p> <p>11 A Yes.</p> <p>12 Q Okay. Being stationed on the fourth floor control, did you ever leave and go to any other housing units?</p> <p>13</p> <p>14</p> <p>15 A Well, on fourth floor control, we sit on the floor control, and every 30 minutes we go into the three housing units and conduct inspections.</p> <p>16</p> <p>17 Q What are the three housing units?</p> <p>18 A 4A, 4B, and 4C.</p> <p>19 Q Would you inspect all three of those units by yourself?</p> <p>20</p> <p>21</p> <p>22 A No, um, we have a partner. So on that specific day, we come up with a, um, method, a way -- we come up with an agreement of how we're going to do the inspections.</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 39</p> <p>1 MS. DAVIS: Okay. All right.</p> <p>2 (Exh. 8 marked for identification.)</p> <p>3 BY MS. DAVIS:</p> <p>4 Q I'm handing you what's been marked as Exhibit Number 8. Do you recognize this document?</p> <p>5</p> <p>6 A No.</p> <p>7 Q Okay. Based on the title of the document, do you know what it is?</p> <p>8</p> <p>9 A It looks like the monthly shift assignments.</p> <p>10 Q Okay. And is that your name in the bottom left column close to where the word "3rd" is written?</p> <p>11</p> <p>12 A Yes. Towards the middle.</p> <p>13 Q And next to your name it says "4FC"?</p> <p>14 A Yes.</p> <p>15 Q What does that stand for?</p> <p>16 A "Fourth floor control".</p> <p>17 Q And what does that mean?</p> <p>18 A That means for third shift on that specific date, I was working on fourth floor control.</p> <p>19</p> <p>20 Q Is that the entire fourth floor?</p> <p>21 A Yes.</p> <p>22 Q Okay. And then almost parallel in the next column over, is that your name as well?</p> <p>23</p> <p>24 A Yes.</p> <p>25 Q And is that because the third shift carried over</p>	<p style="text-align: right;">Page 41</p> <p>1 Q Okay. And would both of you do the inspection at the same time?</p> <p>2</p> <p>3 A No. Somebody has to sit on the floor control.</p> <p>4 Q Okay.</p> <p>5 A At all times.</p> <p>6 Q How do you -- how do you conduct the inspection? Can you just walk me through what that process is?</p> <p>7</p> <p>8 A Well, like I said, you and your partner come up with an agreement of how you're going to do the inspections, and you can start in any -- any one of the three housing units I just named, you can start on any one.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13 Um, sometimes, um, based off the sex of the inmates, the female would just do the female pods and the male would do -- would not go in there at all. So at one time the females were in A and C, so then I would have to do those the entire night, while the male officer would just do B.</p> <p>14</p> <p>15 Or me and my partner, if we were both females, we would go in and do the inspections. We'll do A, B, and C a couple times, and the next person will do it a couple times. We'll do half of the inspections a night, and then the second half of the shift the other person will do them.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25 Q Okay.</p>



<p style="text-align: right;">Page 42</p> <p>1 A It all depends on the agreement you have with 2 whoever you're working with. 3 Q Okay. And how did you mark that an inspection was 4 done? 5 A We started it on the floor control that we started 6 it at that time. And then we would go into the 7 housing units and mark it completed once it was 8 completed. 9 Q Did you do that electronically? 10 A On the computer. The jail log is electronic. 11 Q Okay. 12 MR. ARNOLD: Can I just ask a 13 clarification question? 14 MS. DAVIS: Sure. 15 MR. ARNOLD: This 4A, 4B, and 4C; is that 16 correct? 17 THE WITNESS: Yes, sir. 18 MR. ARNOLD: Which were the male units 19 and which were the female units? 20 THE WITNESS: It depends. Um, at one 21 time 4A was males. More times than not, it was all 22 females. Sometimes it's females and males. 23 MR. ARNOLD: Okay, so it would vary from 24 time to time? 25 THE WITNESS: It would vary from time to</p>	<p style="text-align: right;">Page 44</p> <p>1 and still reported to the SMU? 2 A Yes. 3 Q Okay. How is it -- sorry, strike that. 4 Who determines who responds to a medical 5 emergency? 6 A Well, we're told that -- I was always told that if 7 you can respond, to respond. 8 Q Okay. 9 A It's an emergency. 10 Q And if we look at the User ID that states, or it 11 reads "DLEDE", is that you? 12 A That is. 13 Q Okay. So you wrote this entry? 14 A Yes. 15 Q Okay. That night, did you -- were you reporting to 16 Lieutenant Crystalina Montano? 17 A Um, I think so. 18 Q Okay, how many lieutenants were stationed in the 19 jail during the third shift, if you know? 20 A At least three, I would say. 21 Q And if you know, how many housing units does each 22 lieutenant supervise? 23 A Well, they're usually divided up. If there's three 24 lieutenants, one does booking and intake, one does 25 housing, and that's all of the housing units, and</p>
<p style="text-align: right;">Page 43</p> <p>1 time. 2 MR. ARNOLD: Okay. Thank you. 3 THE WITNESS: Sometimes 4C was female 4 only, and other times it was males only. 5 MR. ARNOLD: Thank you for letting me do 6 that. 7 MS. DAVIS: Yeah, no problem. 8 (Exh. 9 marked for identification.) 9 BY MS. DAVIS: 10 Q I'm handing you what's been marked as Exhibit 9. 11 Do you recognize this document? 12 A Yes. 13 Q What is it? 14 A It's a jail log. 15 Q And is this what the jail logs that you had to do 16 every night looked like? 17 A Yes. 18 Q At the bottom of the page under 4C Count 8, and 19 above 4FC Count 1, do you see your name on the top 20 line in the log text? 21 A Yes. 22 Q And it states that you ended your break and 23 reported to medical emergency in SMU, correct? 24 A Yes. 25 Q You were stationed on the fourth floor that night,</p>	<p style="text-align: right;">Page 45</p> <p>1 the other one does operations, which is basically 2 staying in the office. 3 Q Okay. 4 A Making schedules, answering the phones and things 5 like that. 6 Q Sorry. Okay. So you have that at 0445 hours, you 7 ended your break and responded to the SMU, right? 8 A Yes. 9 Q And you returned at 0524 hours, correct? 10 A Yep. 11 Q Okay. During that time, do you remember what you 12 did while you were at the SMU? 13 A I was -- I ended my break and responded to the SMU 14 for the medical emergency. 15 Q Okay. Do you recall anything about that medical 16 emergency? 17 A Yes. 18 Q What do you remember about it? 19 A I remember going, because I got a radio call, and 20 then, um, I didn't know what I was responding to. 21 And then there was a baby in there on the bed. 22 Q Okay. Do you remember seeing the baby that night? 23 A Yes. 24 Q Did you see any blood? 25 A I don't remember.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q Okay. Do you remember seeing the mother?</p> <p>2 A I did.</p> <p>3 Q Can you describe what she looked like, if you remember?</p> <p>4 A I remember she was laying in the bed, and she was looking like she was sleeping, waking up, and going back to sleep type of thing.</p> <p>5 Q Okay. So it looked like she was going in and out of consciousness?</p> <p>6 A Exactly.</p> <p>7 Q Okay. Did she look calm to you?</p> <p>8 A Yes, because she was in a sleeping, like looked like she was in a sleeping, out of conscious -- not conscious state.</p> <p>9 Q Okay. And prior to that medical emergency, do you remember any other medical emergencies where someone delivered a baby in the Milwaukee County Jail?</p> <p>10 A No.</p> <p>11 Q Do you remember anything after that delivery, where a woman delivered a baby in the Milwaukee County Jail?</p> <p>12 A Yes.</p> <p>13 Q Can you describe what that -- like can you describe that incident?</p>	<p style="text-align: right;">Page 48</p> <p>1 keep you from hearing -- the double doors may keep</p> <p>2 you from hearing the inmate if they were screaming.</p> <p>3 Q Okay. When you were stationed in the SMU at any</p> <p>4 point, do you remember hearing anyone screaming in the cells?</p> <p>5 A Somebody would yell out "CO".</p> <p>6 Q Okay. And I think earlier you mentioned that there is an emergency notification button or system?</p> <p>7 A Yes.</p> <p>8 Q How did that -- well, excuse me, scratch that. How would an inmate use that to notify you about a medical emergency?</p> <p>9 A They would press the button, and the light above their door would come on.</p> <p>10 Q Is that light visible where you're stationed?</p> <p>11 A Yes.</p> <p>12 Q Okay.</p> <p>13 (Exh. 10 marked for identification.)</p> <p>14 BY MS. DAVIS:</p> <p>15 Q I'm handing you what's been marked as Exhibit 10. Is this another jail log?</p> <p>16 A Yes.</p> <p>17 Q So if we turn to Page 992, on the opposite side of the first page, if you look at the entry about a third of the way down with the time 10:22 --</p>
<p style="text-align: right;">Page 47</p> <p>1 A Well, I was working when it happened. Um, and I don't want to say similar circumstances, but one thing that they also said is that no one heard this lady screaming, and she had a baby in her cell.</p> <p>2 Q Okay. Were you working in the housing unit where that woman had her baby?</p> <p>3 A No.</p> <p>4 Q Okay. You said that they said that no one heard her make any sounds. Did anyone talk about whether Rebecca Terry made any sounds when she delivered her child?</p> <p>5 A That was never brought up. I didn't hear that until I was told that this lawsuit was brought about.</p> <p>6 Q Okay. When you were stationed in the SMU, could you easily hear sounds from the different cells?</p> <p>7 A It depends.</p> <p>8 Q On what?</p> <p>9 A If you're first shift and you have inmates out and you have nurses in, you have the TV going, you have radio traffic, you may not hear.</p> <p>10 On third shift it's a little quieter, because there's no TV going. You do have radio traffic. Um, you do have three cells that have double doors. There may be something that could</p>	<p style="text-align: right;">Page 49</p> <p>1 A Mm-hmm.</p> <p>2 Q -- do you see your name?</p> <p>3 A Yes.</p> <p>4 Q Okay. And it states that you attended roll call?</p> <p>5 A Yes.</p> <p>6 Q Do you know who Bridgette Green is?</p> <p>7 A Yes.</p> <p>8 Q Who is that?</p> <p>9 A An officer.</p> <p>10 Q Okay. Why are both of your names listed upon this line?</p> <p>11 A Because we were both assigned for floor control.</p> <p>12 Q Okay. So would she have been your partner that night?</p> <p>13 A Yes.</p> <p>14 Q Okay. And then in the User ID section, "BAGBG", is that Bridgette Green's ID number?</p> <p>15 A Yes.</p> <p>16 Q Okay. And then two rows down it states that Bridgette Green and yourself were debriefed and relieved previous shift?</p> <p>17 A Yes.</p> <p>18 Q During the debriefing, what information would you get from the COs who were on the shift before you?</p> <p>19 A Second shift will tell us, um -- the officer will</p>

<p style="text-align: right;">Page 50</p> <p>1 come out in the specific units and they would tell</p> <p>2 us what issues they had in there during their</p> <p>3 shift.</p> <p>4 Um, they would tell us if -- because of</p> <p>5 certain things, certain things didn't happen, like</p> <p>6 if med pass hasn't happened yet. Um, they would</p> <p>7 just tell us what their day was like in that</p> <p>8 housing unit.</p> <p>9 Q Okay. And then if we go down towards the bottom of</p> <p>10 the page where that first black line, or black bar</p> <p>11 is?</p> <p>12 A Mm-hmm.</p> <p>13 Q Excuse me. The log text states that an inmate</p> <p>14 attempted suicide?</p> <p>15 A Mm-hmm.</p> <p>16 Q Do you remember that happening?</p> <p>17 A Well, there's no name there, so I don't know.</p> <p>18 Q That's fair.</p> <p>19 A And it was four years ago, so I don't know.</p> <p>20 Q Do you recall any attempted suicides the same night</p> <p>21 that Rebecca Terry delivered her baby?</p> <p>22 A I don't.</p> <p>23 Q Okay. But if it happened at 11:52 p.m. on</p> <p>24 March 9th, 2014, in 4FC, is it fair to say and</p> <p>25 assume that you were present?</p>	<p style="text-align: right;">Page 52</p> <p>1 Q Okay. Why would the inmate need two officers and a</p> <p>2 lieutenant to escort them?</p> <p>3 A Because if he's being escorted, um, to Special</p> <p>4 Needs, and being placed on suicide watch, he's in</p> <p>5 restraints, he's in arm restraints. So he has to</p> <p>6 be held on each side, so in case he falls, there's</p> <p>7 someone there, because he can't stop his own fall</p> <p>8 if his hands are restrained.</p> <p>9 Q And earlier you mentioned that during roll call,</p> <p>10 the command officers would talk about additional</p> <p>11 trainings that were available. What else did they</p> <p>12 talk about during roll call?</p> <p>13 A Whatever happened earlier. Whatever happened on</p> <p>14 previous shifts.</p> <p>15 Q Okay.</p> <p>16 A Major incidents, basically.</p> <p>17 Q What would be considered a major incident?</p> <p>18 A If there was a fight. If there was an officer</p> <p>19 assault. If a high-profile inmate came into the</p> <p>20 jail. If there were a lot of medical emergencies.</p> <p>21 Flooding. Um, a major medical emergency.</p> <p>22 Q Okay. Would, for example, an attempted suicide be</p> <p>23 something that would be mentioned during a roll</p> <p>24 call?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 51</p> <p>1 A Yes.</p> <p>2 Q Okay. At the bottom, the last line, or the last</p> <p>3 section of log text, it states that whoever's name</p> <p>4 is redacted was escorted to the Special Needs to be</p> <p>5 placed on suicide watch. Do you see that?</p> <p>6 A Yes.</p> <p>7 Q Would you have gone with Officer Green to do that,</p> <p>8 or would that have been someone else?</p> <p>9 A Officer Green was sitting on the floor control</p> <p>10 writing this.</p> <p>11 Q Okay.</p> <p>12 A Somebody has to stay on the floor control, so she</p> <p>13 would have never left.</p> <p>14 Q Okay. Do you know if you escorted that person --</p> <p>15 do you remember if you escorted that person?</p> <p>16 A I don't.</p> <p>17 Q Okay. Would you have -- if you escorted that</p> <p>18 person, would you have done so by yourself, or with</p> <p>19 another officer?</p> <p>20 A Never by myself. It would have been with another</p> <p>21 officer, at least one other officer and a</p> <p>22 lieutenant.</p> <p>23 Q Okay. Is that common for escorting inmates from</p> <p>24 one housing unit to another?</p> <p>25 A It depends on what they're being escorted for.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q And delivery of a baby, would that be mentioned --</p> <p>2 A Most definitely. That doesn't happen all the time.</p> <p>3 Q That's probably a good thing. Flipping back over</p> <p>4 to MKE991, the first page. At the entry stamped</p> <p>5 10:38, the second one.</p> <p>6 A Mm-hmm.</p> <p>7 Q Again, that User ID is you?</p> <p>8 A Yes. Mm-hmm.</p> <p>9 Q Okay. And, again, is this your entry stating that</p> <p>10 you attended roll call?</p> <p>11 A Yes.</p> <p>12 Q Is there a reason why you didn't include Officer</p> <p>13 Green in yours?</p> <p>14 A Because that would mean I'm the only one doing</p> <p>15 inspections in that housing unit.</p> <p>16 Q Okay. I notice that the times are different</p> <p>17 between the two entries about you attending roll</p> <p>18 call. One is at 10:38 and the other is at 10:22.</p> <p>19 Is that just because you two entered the</p> <p>20 information differently?</p> <p>21 A Yeah. She could be on the floor control entering</p> <p>22 the information, I could have already been starting</p> <p>23 the inspection.</p> <p>24 Q Okay. Okay.</p> <p>25 (Exh. 11 marked for identification.)</p>

<p style="text-align: right;">Page 54</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay, I'm handing you what's been marked as</p> <p>3 Exhibit 11. Earlier you said that you reviewed</p> <p>4 this document before today's deposition?</p> <p>5 A Yes.</p> <p>6 Q Did you review that with anyone in particular, or</p> <p>7 did you just review it by yourself?</p> <p>8 A I reviewed it by myself.</p> <p>9 Q Other than reviewing it for today's deposition, had</p> <p>10 you seen this document before?</p> <p>11 A No.</p> <p>12 Q Okay. What kind of document is this?</p> <p>13 A This is a report.</p> <p>14 Q Okay. Would this incident report be considered a</p> <p>15 major incident?</p> <p>16 MS. KUGLER: Objection. Form.</p> <p>17 THE WITNESS: Um --</p> <p>18 BY MS. DAVIS:</p> <p>19 Q Well, let me actually rephrase that. Would</p> <p>20 delivering a baby in the SMU at Milwaukee County</p> <p>21 Jail be considered a major incident?</p> <p>22 MR. ARNOLD: Objection. Form and</p> <p>23 foundation.</p> <p>24 MS. KUGLER: Join.</p> <p>25</p>	<p style="text-align: right;">Page 56</p> <p>1 A Yes.</p> <p>2 Q How were you contacted?</p> <p>3 A Over radio from master control. I wasn't contacted</p> <p>4 specifically, it was just a general message that</p> <p>5 there's a medical emergency in SMU.</p> <p>6 Q Okay. And you were reporting from the fourth floor</p> <p>7 control, right?</p> <p>8 A No. If I ended my break and reported there, I was</p> <p>9 coming off of break.</p> <p>10 Q Where would you be taking your break?</p> <p>11 A On the second floor.</p> <p>12 Q Okay. Okay. So you said when you arrived, you saw</p> <p>13 Rebecca Terry?</p> <p>14 A Yes.</p> <p>15 Q Was she laying down on the bed?</p> <p>16 A Yes.</p> <p>17 Q And you saw her baby?</p> <p>18 A Yes.</p> <p>19 Q Do you remember seeing whether her umbilical cord</p> <p>20 was still attached to the baby?</p> <p>21 A I don't remember seeing that.</p> <p>22 Q Okay. Do you remember seeing any blood on the</p> <p>23 floor?</p> <p>24 A There was blood on the floor by -- by the toilet.</p> <p>25 Q Okay. Do you remember seeing any blood on the</p>
<p style="text-align: right;">Page 55</p> <p>1 BY MS. DAVIS:</p> <p>2 Q In your experience?</p> <p>3 A The lieutenants and command staff are trained</p> <p>4 what's considered a major incident, not us as</p> <p>5 officers.</p> <p>6 Q Okay. Earlier you said that major incidents would</p> <p>7 be discussed during roll call, right?</p> <p>8 A Mm-hmm.</p> <p>9 Q How would you know that it was a major incident?</p> <p>10 A They would tell us if it was a major incident.</p> <p>11 Q So that's just a title they would give to specific</p> <p>12 occurrences?</p> <p>13 A Um, yes.</p> <p>14 Q Okay. Would there ever be -- as a corrections</p> <p>15 officer, would there ever be a time where you would</p> <p>16 determine something was a major incident?</p> <p>17 A No.</p> <p>18 Q Okay. Let's turn to Page 2 of 4. Do you see your</p> <p>19 name in the third paragraph from the bottom?</p> <p>20 A I do.</p> <p>21 Q Okay. It states that you arrive on the scene at</p> <p>22 0446 hours, right?</p> <p>23 A Yes.</p> <p>24 Q Do you remember reporting to the scene because of</p> <p>25 this medical emergency?</p>	<p style="text-align: right;">Page 57</p> <p>1 walls?</p> <p>2 A I don't remember seeing that.</p> <p>3 Q Do you remember seeing blood on the door?</p> <p>4 A I don't remember seeing that.</p> <p>5 Q Do you remember seeing any blood on the bed?</p> <p>6 A I don't remember seeing that.</p> <p>7 Q Do you remember seeing any blood on Rebecca</p> <p>8 herself?</p> <p>9 A I don't remember seeing that.</p> <p>10 Q Okay. Was there anything on the baby, or covering</p> <p>11 the baby?</p> <p>12 MS. KUGLER: Objection. Form.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Let me rephrase. Was there anything covering the</p> <p>15 baby, to your recollection?</p> <p>16 A No.</p> <p>17 Q Okay. Was there anything covering Rebecca, to your</p> <p>18 recollection?</p> <p>19 A There was a blanket over her.</p> <p>20 Q Okay. Do you recall anyone saying that they didn't</p> <p>21 want to go near Rebecca?</p> <p>22 A No.</p> <p>23 Q Do you recall anyone saying that they didn't want</p> <p>24 to touch her or her baby?</p> <p>25 A No.</p>

<p style="text-align: right;">Page 58</p> <p>1 Q Do you remember how long you were on the scene for that medical emergency?</p> <p>2 A I can only go off what's on the documents.</p> <p>3 Q Okay. After that night, was there any follow-up about this medical incident?</p> <p>4 MR. ARNOLD: Objection. Form and foundation.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q I'll rephrase it. After Rebecca delivered her baby in the SMU, did anyone talk to you about her delivering the baby in the SMU?</p> <p>7 A No.</p> <p>8 Q Prior to finding out about this lawsuit, did you talk to anybody else about Rebecca delivering her baby in the SMU?</p> <p>9 A No.</p> <p>10 Q Did you talk to any other officers that night about Rebecca delivering her baby in the SMU?</p> <p>11 A Just that it was crazy to respond to a medical emergency and see a baby there, because they didn't tell us over the air what was going on.</p> <p>12 Q Okay. Do you know if anyone received any commendations after Rebecca delivered her baby in the SMU?</p> <p>13 A No, I don't know that.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q Is that unusual?</p> <p>2 A Yes. The officer in the area that sees the medical emergency going on usually makes the radio call.</p> <p>3 Q Is there a reason why he wouldn't be the one making the radio call?</p> <p>4 A Yes.</p> <p>5 Q Why?</p> <p>6 A His radio wasn't working for him to make it.</p> <p>7 Q Do you check your radio before you start your shift?</p> <p>8 A Yes.</p> <p>9 Q And if your radio isn't working, would you need to report that to someone?</p> <p>10 MS. KUGLER: Objection. Form.</p> <p>11 THE WITNESS: The only reason why it wouldn't work is the battery is dead.</p> <p>12 BY MS. DAVIS:</p> <p>13 Q Do you know if that's why his radio wasn't working?</p> <p>14 A That's exactly what he told me.</p> <p>15 Q Is it your responsibility to charge the radios?</p> <p>16 A We don't charge the radios, we charge the batteries.</p> <p>17 Q Is it your responsibility to charge the batteries?</p> <p>18 A To get a new battery, yes.</p> <p>19 Q Where would you get the new battery?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q Okay. Would you be surprised to learn that someone did receive a commendation for handling the situation of Rebecca delivering her baby in the SMU?</p> <p>2 MR. ARNOLD: Objection. Foundation.</p> <p>3 MS. KUGLER: Join.</p> <p>4 THE WITNESS: Would I be surprised? Yes.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Okay. Did you ever talk to Brian Wenzel about Rebecca delivering her baby in the SMU?</p> <p>7 A Yes.</p> <p>8 Q When did you talk to him about it?</p> <p>9 A After it happened.</p> <p>10 Q That same day?</p> <p>11 A Yes.</p> <p>12 Q Okay. Do you remember what you talked about?</p> <p>13 A Yes.</p> <p>14 Q What did you talk about?</p> <p>15 A Um, the radio call.</p> <p>16 Q Anything else?</p> <p>17 A No.</p> <p>18 Q Okay. What about the radio call did you talk about?</p> <p>19 A Because master control made the radio call, not him.</p>	<p style="text-align: right;">Page 61</p> <p>1 A From another officer if you're in the SMU.</p> <p>2 Q Okay. And outside of that conversation, did you have any other conversations with Brian Wenzel about the incident?</p> <p>3 A Yes.</p> <p>4 Q What else -- what other conversations did you have?</p> <p>5 A When he told me that he got paperwork that he was being sued.</p> <p>6 Q Okay. Do you remember what you talked about in that conversation?</p> <p>7 A I said, "Yeah, why?" I asked him why was he being sued.</p> <p>8 Q Did he tell you?</p> <p>9 A He said because she was saying that she -- that he ignored her screams when she was having the baby.</p> <p>10 Q Okay. Do you know Brian Wenzel?</p> <p>11 A Yes.</p> <p>12 Q Okay. Would you consider yourself friends?</p> <p>13 A We were co-workers.</p> <p>14 Q Okay. Did you all hang out outside of work?</p> <p>15 A No, never.</p> <p>16 Q Okay. Was it surprising to you that he was sued in this incident?</p> <p>17 A Absolutely.</p> <p>18 MS. KUGLER: Objection to form.</p>

<p style="text-align: right;">Page 62</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Why?</p> <p>3 A Because of the reasons why he was being sued.</p> <p>4 Q What do you mean?</p> <p>5 A The first time we -- he said, and we both said the</p> <p>6 first time we heard about her saying she was</p> <p>7 screaming, was when he told me about the lawsuit.</p> <p>8 Q Okay. Were there any other officers in the SMU</p> <p>9 that night?</p> <p>10 A No, that's only a one-person post.</p> <p>11 Q Okay. And did you talk to any of the other inmates</p> <p>12 housed in the SMU that night?</p> <p>13 A No.</p> <p>14 Q Okay. Excuse me. Did you talk to Lieutenant</p> <p>15 Montano about the incident that night?</p> <p>16 A No.</p> <p>17 Q Would it surprise you if someone delivered a baby</p> <p>18 without screaming?</p> <p>19 MS. KUGLER: Objection. Form.</p> <p>20 MR. ARNOLD: And foundation.</p> <p>21 MS. KUGLER: Join.</p> <p>22 THE WITNESS: I don't know.</p> <p>23 BY MS. DAVIS:</p> <p>24 Q Okay. Have you ever seen a baby delivered?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 MS. KUGLER: Objection. Form.</p> <p>2 THE WITNESS: I don't know. If I didn't</p> <p>3 hear them moving, I don't know what they were doing</p> <p>4 for me not to hear it. I don't know.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Okay, well, how about this, if you were stationed</p> <p>7 in the SMU and someone was moving around in one of</p> <p>8 those cells with the double doors on it, could you</p> <p>9 hear it?</p> <p>10 A If someone were to get up and use the bathroom, the</p> <p>11 only way I would hear it is if the toilet flushed.</p> <p>12 Q Okay. And if someone -- sorry, when you were</p> <p>13 stationed in the SMU, has any -- do you remember</p> <p>14 anyone ever yelling through those two double doors?</p> <p>15 A Yes.</p> <p>16 Q And you could hear them?</p> <p>17 A Yes.</p> <p>18 Q Okay. Would they have had to yell loudly?</p> <p>19 MS. KUGLER: Objection. Form,</p> <p>20 foundation.</p> <p>21 MR. ARNOLD: Join.</p> <p>22 THE WITNESS: I don't know how their loud</p> <p>23 could be different from somebody else's, I don't</p> <p>24 know.</p> <p>25</p>
<p style="text-align: right;">Page 63</p> <p>1 Q When you saw a baby delivered, did the mother</p> <p>2 scream at all?</p> <p>3 A In one instance, no.</p> <p>4 Q Okay.</p> <p>5 A I slept right through it.</p> <p>6 Q Oh, okay. Was that you?</p> <p>7 A No. I don't have any kids. My sister.</p> <p>8 Q Okay, I was -- okay. My apologies, okay.</p> <p>9 So outside off that instance, do you recall</p> <p>10 anyone delivering a baby and not making any sound?</p> <p>11 A No. I haven't seen very many, but no.</p> <p>12 Q Okay. And if someone said that they could hear</p> <p>13 rustling from behind both doors of the cell in</p> <p>14 Rebecca's -- or in the cell Rebecca was housed in,</p> <p>15 do you think they would be able to hear yelling as</p> <p>16 well?</p> <p>17 MS. KUGLER: Objection. Form.</p> <p>18 THE WITNESS: Possibly.</p> <p>19 MS. KUGLER: Foundation.</p> <p>20 BY MS. DAVIS:</p> <p>21 Q And when you were housed -- not housed, I'm sorry,</p> <p>22 when you were stationed in the SMU, could you hear</p> <p>23 people moving around in the cells?</p> <p>24 A Not all the time.</p> <p>25 Q Okay. When could you not hear them moving around?</p>	<p style="text-align: right;">Page 65</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay, if you had to -- well, scratch that. Outside</p> <p>3 of speaking with Brian Wenzel about the lawsuit,</p> <p>4 and after the incident on that same night, did you</p> <p>5 talk to anyone else about Rebecca Terry delivering</p> <p>6 her baby in the SMU at the Milwaukee County Jail?</p> <p>7 A No.</p> <p>8 Q Okay.</p> <p>9 A I talked to my mom. You mean somebody that works</p> <p>10 there?</p> <p>11 Q Anybody.</p> <p>12 A Just my mom.</p> <p>13 Q Do you remember what you all talked about?</p> <p>14 A About the lady having a baby in the jail, and she</p> <p>15 thought it was the one where they said the baby</p> <p>16 died. I said, "No, it was one before that." And</p> <p>17 she said she had never known that. And I was like,</p> <p>18 "Because I never mentioned it."</p> <p>19 She asked me why did I never mention it.</p> <p>20 The baby was, from my opinion, the baby was fine</p> <p>21 and the mother was fine, it's just she had the baby</p> <p>22 in the jail.</p> <p>23 Q And you mentioned a time when the woman had a baby</p> <p>24 in the jail and the baby died. Were you there when</p> <p>25 that happened?</p>



<p style="text-align: right;">Page 66</p> <p>1 A I was there when that happened, but I didn't 2 respond to that area. 3 Q Okay. Did you have to give any statements about 4 that incident? 5 A No. 6 Q Have you ever had to give any other statements 7 about medical emergencies at the Milwaukee County 8 Jail? 9 A Um, outside of work? What do you mean? 10 Q Just in the course of any investigation or 11 follow-up after a medical emergency, were you ever 12 questioned about what happened in the jail? 13 MS. KUGLER: Objection. Form. 14 THE WITNESS: On different medical 15 emergencies, yes. 16 BY MS. DAVIS: 17 Q Could you tell me a little bit about that? 18 A Well, we had deaths in the jail and I was there, so 19 I had to write supplemental reports and speak to 20 detectives. 21 Q Do you remember if any of those deaths happened 22 after Armor Correctional started their contract 23 with the Milwaukee County Jail? 24 A All of them did. 25 Q All of them happened after Armor Correctional came</p>	<p style="text-align: right;">Page 68</p> <p>1 the month before that, in September, maybe. 2 Q Okay. And the one that you were questioned about 3 in April of 2016, do you remember the circumstances 4 surrounding that death? 5 A Yes. 6 Q What happened? 7 A Um, an inmate died of dehydration. 8 Q Do you remember where that person was housed? 9 A In the disciplinary housing unit, 4D, David. 10 Q Okay. And then the incident that happened in 11 September of 2017, do you remember the 12 circumstances of that death? 13 A Yes. 14 Q Was that the baby? 15 A No. 16 Q Okay. Which -- what were the circumstances of that 17 one? 18 A Um, he died in the clinic. 19 Q Okay. Do you know if that person was housed in the 20 SMU before going to the clinic? 21 A No. 22 Q Okay. 23 A He wasn't. 24 Q He wasn't. Do you know where he was before he was 25 in the clinic?</p>
<p style="text-align: right;">Page 67</p> <p>1 on? 2 A Yes. 3 Q Do you know -- 4 A It all happened within a year when I was working 5 there. 6 Q What time period was that, if you remember? 7 A April 2016, and the most recent was October of 8 2017. 9 Q Was there ever any -- scratch that. 10 How many deaths do you remember happening 11 in the course of that time period, April 2016 to 12 October 2017? 13 MR. ARNOLD: Thank you. 14 THE WITNESS: Seven, I believe. 15 BY MS. DAVIS: 16 Q Does that include the baby that died? 17 A Yes. 18 Q Of those seven deaths, how many were you questioned 19 about? 20 A Two. 21 Q And which two were those? 22 A The first one in April. And then maybe the last 23 one in October. 24 Q Okay. 25 A I wasn't there for that one. Um, I think it was in</p>	<p style="text-align: right;">Page 69</p> <p>1 A A general population housing unit. 2 Q Do you know how he died? 3 A No. 4 Q Okay. And then outside of the deaths, do you 5 remember any other medical emergencies that 6 happened where there was no death that you were 7 questioned about? 8 MS. KUGLER: Objection. Form, 9 foundation. 10 THE WITNESS: Questioned about as far as 11 by who and what do you mean? 12 BY MS. DAVIS: 13 Q Well, if there's a medical emergency at the jail, 14 are there any internal investigations that happen? 15 A Sometimes. 16 Q Okay. Were you part of any of those internal 17 investigations? 18 A No. 19 Q Okay. Did you ever give any statements in relation 20 to any of those internal investigations? 21 A For -- I think for that last one, I guess you could 22 say that was internal, because I was questioned by 23 one of our captains. 24 Q Okay. And then outside of internal investigations, 25 are there any other situations where you would be</p>

<p style="text-align: right;">Page 70</p> <p>1 questioned about a medical emergency that happened</p> <p>2 in the jail?</p> <p>3 MS. KUGLER: Objection. Form.</p> <p>4 THE WITNESS: I mean, if it wasn't a</p> <p>5 death, I guess we wouldn't be questioned outside of</p> <p>6 the agency.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q Okay. In terms of major incidents, do you remember</p> <p>9 any major incidents happening at the SMU after</p> <p>10 Armor Correctional began working with the Milwaukee</p> <p>11 County Jail?</p> <p>12 MR. ARNOLD: Objection. Form,</p> <p>13 foundation.</p> <p>14 MS. KUGLER: Join.</p> <p>15 BY MS. DAVIS:</p> <p>16 Q To the best of your recollection, do you know of</p> <p>17 any major incidents around a medical emergency that</p> <p>18 happened after Armor Correctional started working</p> <p>19 with the Milwaukee County Jail?</p> <p>20 MR. ARNOLD: Object again as to</p> <p>21 foundation. My specific objection is to</p> <p>22 foundation, because I'm not sure we've agreed on</p> <p>23 what a major incident is, or what this witness</p> <p>24 believes a major incident is.</p> <p>25 MS. KUGLER: Join.</p>	<p style="text-align: right;">Page 72</p> <p>1 Q Did any of those major incidents relate to a</p> <p>2 medical emergency?</p> <p>3 A Yes. They're not always called major incidents.</p> <p>4 They tell us what happened during the day.</p> <p>5 Q Okay.</p> <p>6 A So we wouldn't know all the time if it was a major</p> <p>7 incident or not.</p> <p>8 Q Okay. To your -- to the best of your recollection,</p> <p>9 did any of those medical emergencies mentioned</p> <p>10 during roll call happen after Armor Correctional</p> <p>11 started working in the Milwaukee County Jail?</p> <p>12 A Were major medical emergencies after Armor?</p> <p>13 Q Mm-hmm.</p> <p>14 A Yes.</p> <p>15 Q Okay. And if you can estimate, would you say that</p> <p>16 there were more after Armor started, or before?</p> <p>17 MS. KUGLER: Objection. Form,</p> <p>18 foundation.</p> <p>19 MR. ARNOLD: Join. If you know.</p> <p>20 BY MS. DAVIS:</p> <p>21 Q If you can remember. Do you remember whether there</p> <p>22 were more medical emergencies mentioned during roll</p> <p>23 call before or after Armor started working with the</p> <p>24 Milwaukee County Jail?</p> <p>25 MS. KUGLER: Same objections.</p>
<p style="text-align: right;">Page 71</p> <p>1 BY MS. DAVIS:</p> <p>2 Q I think we talked about it, but we can go through</p> <p>3 it again. To your understanding, what is a major</p> <p>4 incident?</p> <p>5 A When something completely abnormal happens in the</p> <p>6 jail, um, and the lieutenants and the captains have</p> <p>7 to get together and write a report.</p> <p>8 Q Okay. And would you hear about these major</p> <p>9 incidents during roll call?</p> <p>10 A Yes.</p> <p>11 Q Okay.</p> <p>12 A If you go to roll call every day.</p> <p>13 Q Did you go to roll call every day?</p> <p>14 A No.</p> <p>15 Q Were you supposed to go to roll call every day?</p> <p>16 A Yeah, but if you start on the shift before, you're</p> <p>17 not expected to go to roll call.</p> <p>18 Q Were there ever any times where you didn't start</p> <p>19 from a shift before and you didn't go to roll call?</p> <p>20 MS. KUGLER: Objection. Form.</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MS. DAVIS:</p> <p>23 Q Okay. During roll call, do you remember hearing</p> <p>24 about major incidents from the command staff?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 73</p> <p>1 THE WITNESS: I would have to say yes,</p> <p>2 there were more.</p> <p>3 BY MS. DAVIS:</p> <p>4 Q There were more after Armor started working with</p> <p>5 the Jail?</p> <p>6 A Yes.</p> <p>7 Q Okay.</p> <p>8 A We didn't have deaths at all prior to Armor, and</p> <p>9 then we had them.</p> <p>10 Q Okay. And when Armor started working in the jail,</p> <p>11 outside of that mental health training that you</p> <p>12 mentioned in October 2017, do you remember any</p> <p>13 other trainings that Armor specifically led for the</p> <p>14 COs?</p> <p>15 A I don't remember.</p> <p>16 Q I think that's all for me. Thank you.</p> <p>17 MR. ARNOLD: Let me go through my notes.</p> <p>18 I think there's a couple things that I wanted to</p> <p>19 clarify.</p> <p>20 MS. DAVIS: Can we take a quick break</p> <p>21 real quick?</p> <p>22 MR. ARNOLD: Of course.</p> <p>23 (Short recess taken.)</p> <p>24</p> <p>25</p>



<p style="text-align: right;">Page 74</p> <p>1 EXAMINATION</p> <p>2 BY MR. ARNOLD:</p> <p>3 Q You were asked some questions about your training</p> <p>4 during the academy, whether there was testing after</p> <p>5 the academy. Do you remember that?</p> <p>6 A Yes, sir.</p> <p>7 Q What I'm trying to understand is, I understand that</p> <p>8 there was -- that once the academy was completed,</p> <p>9 you weren't going to the academy anymore, right?</p> <p>10 A Some of those annual trainings were at the academy.</p> <p>11 Q Okay. Let's just talk about the initial training</p> <p>12 that you had. That was at the academy?</p> <p>13 A Yes, sir.</p> <p>14 Q Once that training was completed, then your</p> <p>15 assignment was to go somewhere else other than the</p> <p>16 academy when you got to work, right?</p> <p>17 A Yes.</p> <p>18 Q What I want to find out is, while you were still at</p> <p>19 the academy doing the training, was there any</p> <p>20 testing that was done during the training, as</p> <p>21 opposed to after the training was done?</p> <p>22 A Yes.</p> <p>23 Q Okay. Tell me about that.</p> <p>24 A Basically there were, I believe it was six tests.</p> <p>25 You were only able to fail one or two.</p>	<p style="text-align: right;">Page 76</p> <p>1 A If somebody would call out for me, I would go see</p> <p>2 what they wanted.</p> <p>3 Q Okay. And you didn't have any difficulty hearing</p> <p>4 that from where you were stationed?</p> <p>5 A No.</p> <p>6 Q Okay. That's all I have. Thank you.</p> <p>7 MS. KUGLER: I have just a couple of</p> <p>8 follow-ups.</p> <p>9 EXAMINATION</p> <p>10 BY MS. KUGLER:</p> <p>11 Q I believe that you testified that you started at</p> <p>12 Milwaukee County Jail in November of 2012; is that</p> <p>13 correct?</p> <p>14 A In February of 2012.</p> <p>15 Q Okay, I might be mistaken.</p> <p>16 A I went to Milwaukee County Jail in November of</p> <p>17 2012.</p> <p>18 Q Okay, because prior to that you were at the House</p> <p>19 of Corrections, correct?</p> <p>20 A Mm-hmm.</p> <p>21 Q Okay. Do you know when Armor started at Milwaukee</p> <p>22 County Jail?</p> <p>23 A It was sometime after the split in 2013.</p> <p>24 Q What do you mean by "after the split"?</p> <p>25 A Um, Sheriff Clarke, David Clarke, he had control</p>
<p style="text-align: right;">Page 75</p> <p>1 Q Okay.</p> <p>2 A And then when the second or third one, if you</p> <p>3 failed the second or the third one, whichever one</p> <p>4 it was, you were asked to leave.</p> <p>5 Q I see. And you completed that testing during the</p> <p>6 academy training?</p> <p>7 A Yes, sir.</p> <p>8 Q And successfully so?</p> <p>9 A Yes, I never failed a test.</p> <p>10 Q And I can't remember whether you said whether there</p> <p>11 was any testing at any of the follow-up training</p> <p>12 that occurred after the initial training academy?</p> <p>13 A There were worksheets to be completed.</p> <p>14 Q That's right.</p> <p>15 A But not a pass/fail sort of thing.</p> <p>16 Q Okay. Thank you. My notes say that you said</p> <p>17 something along the lines of you could hear</p> <p>18 somebody call out "CO" from the -- if it was quiet</p> <p>19 on the third shift in the SMU. Did I have that</p> <p>20 right?</p> <p>21 A Yes.</p> <p>22 Q What do you recall about that?</p> <p>23 A What do I recall about saying that?</p> <p>24 Q No, I'm sorry. What do you recall about hearing</p> <p>25 that, or being able to hear that?</p>	<p style="text-align: right;">Page 77</p> <p>1 over the House of Corrections and Milwaukee County</p> <p>2 Jail. And in mid-2013, the County Board split it</p> <p>3 and let the County -- the House of Correction be</p> <p>4 its own entity ran by a superintendent, and then</p> <p>5 Milwaukee County Jail was left under the direction</p> <p>6 of David Clarke.</p> <p>7 Q Okay, so your recollection is that Armor started at</p> <p>8 Milwaukee County Jail in mid-2013; is that correct?</p> <p>9 A No. No. Because the nurses were there, and a lot</p> <p>10 of them stayed until the end of the year. Because</p> <p>11 I think as of January 1st of 2014, they were being</p> <p>12 ran by Armor, but don't quote me on that.</p> <p>13 Because the split happened, they were still</p> <p>14 County nurses there, they didn't just leave because</p> <p>15 of that split. And I don't think that was even</p> <p>16 related to the split.</p> <p>17 Q Okay. So your understanding is Armor started at</p> <p>18 Milwaukee County Jail --</p> <p>19 A In January 2014, is what I believe.</p> <p>20 Q Okay. So when counsel asked you about your</p> <p>21 understanding of deaths before and after Armor</p> <p>22 started, the time period you're using with respect</p> <p>23 to your answer is limited to November 2012 to when</p> <p>24 Armor started, which you believe happened in about</p> <p>25 January 2014?</p>

<p style="text-align: right;">Page 78</p> <p>1 A I would say April, because I was working for  2 Milwaukee County Sheriff's Office, so we would know  3 about deaths at the jail.  4 Q Okay. And you don't know anything about the  5 situation at Milwaukee County Jail prior to your  6 time working for the Sheriff's Office in general?  7 A I think in December of 2011 there was a suicide,  8 but it wasn't like a death, he did that to himself.  9 Q Okay. Okay, that's all I have.  10 MS. DAVIS: Just one question.  11 E X A M I N A T I O N  12 BY MS. DAVIS:  13 Q Outside of that suicide, do you remember any other  14 deaths being talked about at Milwaukee County Jail  15 during the time that you were employed by the  16 Milwaukee County Sheriff's Office?  17 MS. KUGLER: Objection. Foundation.  18 THE WITNESS: While I was working there,  19 the only deaths that happened there started in  20 April of 2016. Those were the only deaths while I  21 was employed there, from April until that October.  22 BY MS. DAVIS:  23 Q And you're sure that in April of 2016, Armor  24 Correctional was working with the Milwaukee County  25 Jail?</p>	<p style="text-align: right;">Page 80</p> <p>1 STATE OF WISCONSIN )  2 ) SS:  3 COUNTY OF MILWAUKEE )  4 I, Wendy L. Hanneman, Registered  5 Professional Reporter and Notary Public in and for the  6 State of Wisconsin, do hereby certify that the  7 deposition of DASHYLA ELLIOT was reported by me and  8 reduced to writing under my personal direction.  9 I further certify that said deposition was  10 taken at LEIB, KNOTT &amp; GAYNOR, LLC, 219 North Milwaukee  11 Street, Suite 710, Milwaukee, Wisconsin, on the 24th day  12 of April, 2018, commencing at 10:03 a.m. and concluding  13 at 11:42 a.m.  14 I further certify that I am not a relative  15 or employee or attorney or counsel of any of the  16 parties, or a relative or employee of such attorney or  17 counsel, or financially interested directly or  18 indirectly in this action.  19 In witness whereof, I have hereunto set my  20 hand and affixed my seal of office at Milwaukee,  21 Wisconsin, this 4th day of May, 2018.  22  23 Wendy L. Hanneman - Notary Public  24 In and for the State of Wisconsin  25  26 My Commission Expires: October 9, 2021.</p>
<p style="text-align: right;">Page 79</p> <p>1 A Most definitely.  2 Q Okay. All right, that's all for me.  3 MR. ARNOLD: Thank you. You're done.  4 THE WITNESS: Oh, good.  5 (Deposition concluded at 11:42 a.m.)  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p>	

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